

No. 23-12737

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**In the United States Court of Appeals  
for the Eleventh Circuit**

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YIFAN SHEN, ET AL.,  
*Plaintiffs-Appellants,*

v.

COMMISSIONER, FLORIDA DEPARTMENT OF  
AGRICULTURE, ET AL.,  
*Defendants-Appellees.*

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On Appeal from the United States District Court  
for the Northern District of Florida  
No. 4:23-cv-00208-AW-MAF

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**MOTION TO WITHDRAW AS COUNSEL**

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January 27, 2025

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**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

Defendants certify that, to the best of their knowledge, the following is a complete list of interested persons as required by Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rules 26.1-1 to 26.1-3:

1. American Civil Liberties Union Foundation,
2. American Civil Liberties Union Foundation of Florida,
3. Anti-Racism Center of LMU Loyola Law School,
4. Aoki Center for Critical Race and Nation Studies at UC Davis School of Law,
5. Arkansas, State of,
6. Asian Americans Advancing Justice – Asian Law Caucus,
7. Asian Americans Advancing Justice – Atlanta,
8. Asian American Legal Defense & Education Fund,
9. Asian American Women’s Political Initiative,
10. Asian Law Alliance,
11. Asian Pacific American Bar Association of Tampa Bay,
12. Bailey, Andrew,
13. Bell, Daniel W.,
14. Boston University Center for Antiracist Research,

15. Butler, Steve,
16. Carr, Christopher M.,
17. Center for Civil Rights and Racial Justice at the University of Pittsburgh  
School of Law,
18. Center for Immigration Law, Policy and Justice at Rutgers Law School,
19. Center on Race, Inequality, and the Law at New York University School  
of Law,
20. Chang, Robert Seungchul,
21. Chin, Gabriel J.,
22. Chinese for Affirmative Action,
23. Clarke, Kristen,
24. Conference of Asian Pacific American Law Faculty,
25. Coody, Jason R.,
26. Costello, David M.,
27. Cuison-Villazor, Rose,
28. DeHeng Law Group, PC,
29. Fitch, Lynn,
30. Fitzgerald, Patricia,
31. Fitzpatrick, Martin A.,

- 32. Florida Office of the Attorney General,
- 33. Formella, John M.,
- 34. Forrester, Nathan A.,
- 35. Fred T. Korematsu Center for Law and Equality at Seattle University  
School of Law,
- 36. Georgia, State of,
- 37. Gorski, Ashley Marie,
- 38. Griffin, Tim,
- 39. Handberg, Roger B.,
- 40. Harwell, Jr., Lacy R.,
- 41. Hispanic National Bar Association,
- 42. Idaho, State of,
- 43. Indiana, State of,
- 44. Jackley, Marty J.,
- 45. Jacobs, Arthur, I.,
- 46. Jadwat, Omar,
- 47. Japanese American Citizens League,
- 48. Jarwala, Alisha,
- 49. Kelly, J. Alex,

50. Knudsen, Austin,
51. Koo, Elizabeth L.,
52. Labrador, Raúl R.,
53. LaPointe, Markenzy,
54. Larizza, R.J.,
55. Latino Justice PRLDEF,
56. Lee, Dexter,
57. Li, Bethany Yue-Ping,
58. Liu, Yongxin,
59. Longfield, Timothy J.,
60. Maurer, Michael S.,
61. Mahfooz, Sidra,
62. Mississippi, State of,
63. Missouri, State of,
64. Montana, State of,
65. Moody, Ashley,
66. Multi-Choice Realty, LLC,
67. National Asian Pacific American Bar Association,
68. New Hampshire, State of,

69. Nordby, Daniel E.,
70. North Dakota, State of,
71. Pagnucco, Carrie,
72. Quinn Emanuel Urquhart & Sullivan, LLP,
73. Rather, Shaiba,
74. Reyes, Sean,
75. Rodriguez, Madeleine Kristine,
76. Rokita, Theodore E.,
77. Rundle, Katherine Fernandez,
78. Sayler, Erik Louis,
79. Schenck, Robert S.,
80. Shaffer, Derek Lawrence,
81. Shen, Yifan,
82. Shutts & Bowen, LLP,
83. Simpson, Wilton,
84. Song, Jian,
85. South Asian Bar Association of North America,
86. South Carolina, State of,
87. South Dakota, State of,

88. Taitz, Sarah Michelle,
89. Tang, Haiyan,
90. Tilley, Daniel Boaz,
91. Toomey, Patrick Christopher,
92. Turner, Joshua Nathaniel,
93. U.S. Department of Justice,
94. Utah, State of,
95. Wang, Xinxi,
96. Warren, Nicholas,
97. Whitaker, Henry C.,
98. Wilson, Alan,
99. Winsor, Honorable Allen C.,
100. Wofsy, Cody H.,
101. Wold, Theodore, J.,
102. Worrell, Monique,
103. Wrigley, Drew H.,
104. Xu, Zhiming,
105. Zafar, Noor,
106. Zaman, Razeen J.,

107. Zhu, Keliang

No publicly traded company or corporation has an interest in the outcome of this case or appeal.



**MOTION TO WITHDRAW AS COUNSEL**

I, Daniel William Bell, respectfully request leave to withdraw as counsel for defendants-appellees, the Chair of the Florida Real Estate Commission, Commissioner of the Florida Department of Agriculture and Consumer Services, and Secretary of the Florida Department of Economic Opportunity. I will be leaving the Office of the Attorney General on January 31, 2025. The defendants-appellees will continue to be represented by Nathan Forrester, David Costello, and Robert Schenck.

Dated: January 31, 2025

Respectfully submitted,

JOHN M. GUARD

*Acting Attorney General of Florida*

/s/ Daniel W. Bell

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*Chief Deputy Attorney General*

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### **CERTIFICATE OF COMPLIANCE**

1. This document complies with the type-volume limits of Federal Rule of Appellate Procedure 27(d)(2) because, excluding the parts of the document exempted by Federal Rule of Appellate Procedure 32(f), this document contains 74 words.

2. This document complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure 32(a)(5) and Federal Rule of Appellate Procedure 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Garamond font.

/s/ Daniel William Bell  
Chief Deputy Attorney General

**CERTIFICATE OF SERVICE**

I certify that on January 31, 2025, I electronically filed this document with the Clerk of Court using the Court's CM/ECF system, which will send a notice of docketing activity to all parties who are registered through CM/ECF.

/s/ Daniel William Bell  
Chief Deputy Attorney General